

13 MISC 0381

Jeffrey L. Schulman
DICKSTEIN SHAPIRO LLP
1633 Broadway
New York, NY 10019-6708
Phone: (212) 277-6500
Fax: (212) 277-6501
Email: schulmanj@dicksteinshapiro.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

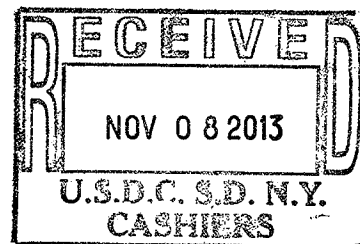
FEDERAL DEPOSIT INSURANCE
CORPORATION AS RECEIVER FOR OMNI
NATIONAL BANK

Plaintiff,

v.

EVEREST REINSURANCE HOLDINGS, INC.,

Defendant.



Misc. Case No. _____

[Case No. 1:12-cv-01103-RLV Pending in
U.S. District Court for the Northern District
of Georgia]

**NOTICE OF FEDERAL DEPOSIT
INSURANCE CORPORATION AS
RECEIVER FOR OMNI NATIONAL
BANK'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS
FROM NON-PARTY EVEREST
REINSURANCE HOLDINGS, INC.**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and Declaration of Joseph M. Saka in support of the motion to compel, dated November 8, 2013, together with the exhibits attached thereto, the Federal Deposit Insurance Corporation as Receiver for Omni National Bank ("FDIC-R") moves this Court before the Part 1 Judge, at the United States Courthouse, Southern District of New York, located at 500 Pearl Street, New York, New York, for an Order compelling full compliance with the subpoena for the production of documents from non-party Everest Reinsurance Holdings, Inc. for the reasons set forth in the accompanying memorandum of law, and granting such other and further relief as this Court considers appropriate.

Dated: New York, New York
November 8, 2013

DICKSTEIN SHAPIRO LLP

By: 

Jeffrey L. Schulman
S.D.N.Y. Bar No.: JS-5739
1633 Broadway
New York, New York 10019-6708
Telephone: (212) 277-6500
Facsimile: (212) 277-6501
schulmanj@dicksteinshapiro.com

Of Counsel:

Andrew M. Reidy

Joseph M. Saka

DICKSTEIN SHAPIRO LLP

1825 "Eye" Street NW

Washington, DC 20006

Telephone: (202) 420-2200

Facsimile: (202) 420-2201

Email: reidya@dicksteinshapiro.com

Email: sakaj@dicksteinshapiro.com

-and-

James A. Brown

George Denegre, Jr.

Carey L. Menasco

Elisabeth L. Baer

LISKOW & LEWIS, PLC

One Shell Square

701 Poydras Street, Suite 5000

New Orleans, LA 70139-5099

Tel: (504) 581-7979

Fax: (504) 556-4108

E-mail: jabrown@liskow.com

gdenegre@liskow.com

clmenasco@liskow.com

elbaer@liskow.com

*Attorneys for the Federal Deposit Insurance
Corporation as Receiver for Omni National Bank*